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Attorneys for Defendant Broadcaster Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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:
BAYTREE CAPITAL ASSOCIATES, LLC,
derivatively and on behalf of, :
BROADCASTER INC., :
:
Plaintiff, :
:
-against- :
:
Case No. 08 Civ. 1602 (LLS)
NOLAN QUAN, et al., :
:
Defendants. : NOTICE OF MOTION
:
-and- :
:
BROADCASTER INC. :
:
Nominal Defendant. :
:
-----X


PLEASE TAKE NOTICE that upon the accompanying Declarations of Eugene Licker, Esq. and Martin Wade, each dated March 28, 2008, and the accompanying memorandum of law, Defendant Broadcaster Inc., by its attorneys Loeb & Loeb LLP, will move this Court before Hon. Louis L. Stanton at the Courthouse located at 500 Pearl Street, New York, New York 10007, as soon as counsel can be heard for an

Order pursuant to 28 U.S.C. §1404(a) transferring this action to the United States District Court for the Central District of California.

PLEASE TAKE FURTHER NOTICE that pursuant to the direction of the Court, answering papers shall be served within 3 business days of service of this motion (*i.e.*, by April 2, 2008).

Dated: New York, New York
March 28, 2008

LOEB & LOEB LLP

By: 
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